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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

KATE GRANT and KARMANN KASTEN,
LLC,

Plaintiff,

vs.

KEVIN LONG; MILLCREEK
COMMERCIAL PROPERTIES, LLC;
COLLIERS INTERNATIONAL; BRENT
SMITH; SPENCER TAYLOR; BLAKE
MCDOUGAL; and MARY STREET,

Defendants.

**NOTICE OF 30(b)(6) DEPOSITION OF
MILLCREEK COMMERCIAL
PROPERTIES, LLC**

Civil No. 2:23-cv-00936-DBB-DAO

District Judge David Barlow

Magistrate Judge Daphne A. Oberg

TO DEFENDANT MILLCREEK COMMERCIAL PROPERTIES, LLC, AND ITS

ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs, pursuant to Fed. R. Civ. P. 30(b)(6) and DUCivR 30-2, will take the deposition of one or more designated representative(s) of Defendant Millcreek Commercial, LLC ("Millcreek") on July 30, 2024, beginning at 9:30 a.m. (MDT) and continuing until completed, or at such other date and time as may be agreed by counsel. The deposition will be held at Christiansen Law, PLLC, at 311 S. State, Ste. 250, Salt Lake City, UT 84111. The deposition will be on oral examination under oath before a certified court reporter in accordance with the Federal Rules of Civil Procedure.

Pursuant to Fed. R. Civ. P. 30(b)(6), Millcreek shall designate on its behalf one or more officers, directors, managing agents, or other persons to offer testimony as to the subjects described below.

TOPICS OF EXAMINATION

1. The formation, management, execution, and continuance of Millcreek's Tenancy-In-Common ("TIC") program.
2. Marketing materials used by Millcreek in its advertising and sales of TIC interests at the Naperville property.
3. Representations and communications made by Millcreek to plaintiffs about the TIC program.
4. The value of the Naperville property at the time plaintiffs invested.
5. The bond that Millcreek represented to have been issued by Lloyds of London.
6. Any other bond obtained to cover the Naperville property.
7. Colliers International's relationship with Millcreek.
8. Millrock Fund 1's relationship to Millcreek.
9. Advance Care Medical, Inc. and Healthcare Solutions Holdings Inc.'s ("HSH") tenancy.
10. Neuragenix's tenancy.
11. Millcreek's claims against Neuragenix in Neuragenix's bankruptcy proceedings.
12. The involvement of each of the named defendants in this case with the TIC and with the Naperville property.
13. Millcreek's initial disclosure documents and pleading.
14. Millcreek's responses to discovery requests.
15. Millcreek's determination not to register the TIC offerings with the SEC.

16. The allegations, claims, and defenses in the Amended Complaint and Millcreek's Answer in this case.

DATED this 28th day of June, 2024.

CHRISTIANSEN LAW, PLLC

By: /s/ Stephen K. Christiansen
Stephen K. Christiansen
Randall S. Everett
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2024, I caused a true and correct copy of the within and preceding document to be served via email on the following.

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